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UNITED STATES OF AMERICA,  
PLAINTIFF,  
VS.  
LONNY DITIRRO,  
DEFENDANT

## COMPLAINT

**VIOLATION: 18 U.S.C. § 2252A(a)(5),  
POSSESSION OF CHILD PORNOGRAPHY**

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
Complainant, being first duly sworn, deposes and states:

**COUNT ONE**

### *Possession of Child Pornography*

Beginning on a date unknown and continuing through on or about September 9, 2015, in the State and Federal District of Nevada and elsewhere,

**LONNY DITIRRO.**

defendant herein, did knowingly possess child pornography and any material that contains child pornography, as defined in Title 18, United States Code, Section 2252A(a)(5), prohibits a person from knowingly possessing any book, magazine, periodical, film, videotape, computer disk, or other

1 material that contains an image of child pornography that has been mailed, shipped, or transported in  
2 interstate or foreign commerce by any means, including by computer, or that was produced using  
3 materials that have been mailed, shipped, or transported in interstate or foreign commerce by any  
4 means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5).

5 **PROBABLE CAUSE AFFIDAVIT**

6 I, Scott Miller, Complainant, as and for probable cause, state the following:

7 1. I am currently assigned as a Detective with the Las Vegas Metropolitan Police  
8 Department (LVMPD) and assigned to investigate Internet Crimes Against Children (ICAC). I have  
9 approximately 7 years of experience as a Detective. I have received training in the field of child  
10 pornography, internet crimes against children, and interview and interrogation. I am currently a  
11 Task Force Officer (TFO) and member of the FBI's Child Exploitation Task Force. I have been a  
12 TFO since 2016.

13 2. This Affidavit is made in support of a complaint charging LONNY DITIRRO with a  
14 violation of Title 18, United States Code, Section 2252A(a)(5), which makes it illegal for a person to  
15 possess child pornography.

16 3. The statements contained in this affidavit are based on an ongoing Las Vegas  
17 Metropolitan Police Department (LVMPD) investigation for which I have been personally involved,  
18 and also includes information obtained from other law enforcement officials involved in the  
19 investigation.

20 4. On September 10, 2015, former LVMPD Task Force Officer Shannon Tooley,  
21 P#6224, received a police report from LVMPD Officers N. Bianco, P#15086 and G. Wilson,  
22 P#9177, referencing a child exploitation call for service. Officers contacted a civilian identified  
23 herein as "Witness-1," who was previously in a relationship with LONNY DITIRRO. Witness-1  
24

1 reported that she found a SanDisk Micro SD card in her bed that belonged to LONNY DITIRRO.  
2 Witness-1 stated she viewed the contents of the SanDisk Micro SD card and found what she  
3 believed to be child pornographic images on the SanDisk Micro SD card. Officers also viewed  
4 contents of SanDisk Micro SD card and observed several images of females who appeared to be  
5 between 13 and 15 years of age, engaged in sexual acts with the defendant. Officers impounded the  
6 SanDisk Micro SD card into evidence and notified Detective Tooley of their preliminary  
7 investigation.

8         5.       On November 30, 2015, Detective Tooley conducted an interview with Witness-1.  
9 Witness-1 described that she and LONNY DITIRRO had begun dating in early 2015. Witness-1  
10 stated that LONNY DITIRRO moved into her apartment in Las Vegas, NV, with her shortly after  
11 that they began dating. On or about September 9, 2015, while in bed, Witness-1 discovered a micro  
12 SD card stuck to her leg. Witness-1 stated that she believed the SanDisk Micro SD card belonged to  
13 LONNY DITIRRO as he had been asking her if she has seen this card. Witness-1 viewed the  
14 contents of the SanDisk Micro SD card and found images of LONNY DITIRRO both clothed and  
15 nude, images of child pornography, and other photos of LONNY DITIRRO engaged in sexual acts  
16 with a female who appears to be under 16 years of age.<sup>1</sup>

17         6.       Based on information learned during this investigation, LONNY DITIRRO was  
18 determined to be the suspect related to this child pornography investigation. Evidence seized from  
19 Witness-1 included, but is not limited to, one SanDisk Micro SD Card.

20         7.       On December 2, 2015, Detective Tooley had a search warrant signed by State of  
21 Nevada Judge Diana Sullivan and served the warrant on same date to seize and perform a full  
22 forensic examination on the SanDisk Micro Secure Digital Card (16GB), for evidence of child  
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24         <sup>1</sup>       Law enforcement is actively working to identify this unidentified girl.

1 pornography and proof of ownership of the SanDisk Micro SD card.

2 8. On March 7, 2016, LVMPD Forensic Analyst Matt Trafford, P#14286, completed a  
3 forensic examination on the SanDisk Micro Secure Digital Card (16GB). The results of the  
4 examination revealed 254 images and 42 videos of child pornography that were found saved on the  
5 SanDisk Micro SD card. There were also 111 images that are child exploitive (age difficult) and 30  
6 images of computer generated image (CGI)/animation that are child exploitative. In addition, there  
7 are 235 images/videos of suspect LONNY DITIRRO located on the SanDisk Micro SD card;  
8 proving that the SanDisk Micro SD card belongs to him. 56 of the 254 images of child pornography  
9 were tagged as involving infants/toddlers and 5 images of the 254 being sadomasochism/violence  
10 related.

11 9. The following are descriptions of two of the images and one of the videos recovered  
12 from LONNY DITIRRO's SanDisk Micro SD Card:

13 (a) **File name:** ending in "c56cca0c52bc.jpg"

14 **Description:** Nude pre-pubescent female child lying on her back, with an image of a  
15 playboy bunny drawn above her vagina and the words "Fuck Me." One adult erect penis is seen  
above her that is dripping with ejaculate. Another adult's erect penis is penetrating her anus. The  
child also has a large amount of semen on her chest/stomach area.

16 (b) **File name:** 01-1.jpeg

17 **Description:** An adult male with an erect penis is seen holding his penis with his left  
hand and ejaculating into the mouth of a pre-pubescent female child.

18 (c) **File name:** ending in "g-lift\_fk.mpg"

19 **Description:** A nude adult male is lying on his back with an erect penis; while a  
20 nude pre-pubescent female child is seen straddling the adult male. The male is penetrating the  
child's vagina with his penis as he has vaginal sex with the female child.


21 ...

22 ...

23 ...

CONCLUSION

10. Based on my training, experience and the totality of the facts related, I submit that there is probable cause to believe that LONNY DITIRRO, defendant herein, has violated Title 18, United States Code, Section 2252A(a)(5), *Possession of Child Pornography*.

  
\_\_\_\_\_  
Scott Miller

Detective – Las Vegas Metropolitan Police Department  
Task Force Officer - FBI

Subscribed and sworn to before me this 10<sup>th</sup> day of June, 2016.

  
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HONORABLE NANCY J. KOPPE  
United States Magistrate Judge